

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
NASHVILLE, TENNESSEE 37243-1531



Memorandum

To: 22-0079-11
From: Jerry Swinea
Date: April 21, 2015
Subject: Operational Flexibility Request #19449 (Operating Permit 060880P)

TAPCR 1200-03-.02(1)(aa)4.: Any physical change in or change in the method of operation of an air contaminant source not subject to requirements of paragraphs 1200-03-09-.02(11), 1200-3-9-.01(4), and 1200-03-09-.01(5) and which does not result in emissions exceeding the emissions allowable under the existing operating permit and which does not result in the emission of any air contaminant (to which an emission standard applies) not previously emitted, shall not require a construction permit under subparagraph 1200-03-09-.01(1)(a). The air contaminant source, to make changes pursuant to this part, shall provide the Technical Secretary with written notification of at least 7 days in advance of the proposed change. The written notification shall contain:

Brief description of the change	Included – addition of one conveyor
The date on which the change will occur	Not included, but the letter states that the change will be made pursuant to TAPCR 1200-03-.02(1)(aa). I am reading the letter to mean that they are making the change no sooner than 7 days after the notification was submitted
Pollutants emitted and declaration of any change in emissions	VOCs. No increase in emissions will occur due to the addition of the Halogen light drying tunnel.
Any applicable requirements that would apply as a result of the change	None.
Statement that the change does not result in emissions exceeding the emissions allowable under the existing operating permit	Included. The emission summary for operating permit 060880P indicates no emission changes.
The Technical Secretary and the air contaminant source shall attach each such notice to their copy of the relevant permit.	Response letter instructs the permittee to attach a copy of the letter to operating permit 060880P.